

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re Lauren Scholl

Debtor(s)

Case No. **22-10944**
Chapter **13**

MOTION TO MODIFY CHAPTER 13 PLAN POST-CONFIRMATION

Debtor, Lauren Scholl, by and through her attorney, Tova Weiss, does hereby file this Motion to Modify her Chapter 13 Plan Post-Confirmation and in support thereof states as follows:

1. On or about November 2023 a Stipulation to place post petition mortgage arrear in the amount of \$3,872.50 into the plan, however the debtor would make payments on this amount outside the plan. Said Stipulation was signed by Attorney Cornin (for Movant PennyMac Loans), Attorney Tova Weiss, (Attorney for Debtor, Lauren Scholl) and the Trustee Kenneth West signed by Trustee LeeAnn Huggins. On December 1, 2024, The Court approved said Stipulation. (See attached Stipulation, Exhibit "A")
2. On March 6, 2024, Debtor's counsel filed the Modified plan and now filed this instant Motion to Modify the Chapter 13 Plan. Nothing has changed in the plan payments, as debtor has already made these post-petition payments, however the Stipulation required that the amount of post-petition arrears be placed in the Chapter 13 plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court Grant this Motion to Modify and allow Debtor to file the Modified Chapter 13 plan.

Respectfully submitted,

/s/Tova Weiss
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